

Tracie Billington  
Chief, Special Projects Section  
Department of Water Resources  
Division of Planning and Local Assistance  
Sacramento, CA 94236

Subject: Proposition 50 Chapter 8 Planning Grant Proposal Evaluation - San Joaquin River  
Exchange Contractors Water Authority: PIN 4816

Dear Ms. Billington,

Thank you for taking the time to meet with us on Monday to review the evaluation of our Proposition 50 Chapter 8 Planning Grant Proposal - PIN 4816. This proposal is very important to the USJR region and deserves Proposition 50 funding.

As we discussed, the proposed IRWMP effort is critical to completion of the final phase of a 3 year planning process for the Upper San Joaquin River (USJR) being conducted by the San Joaquin River Resource Management Coalition (RMC) and the San Joaquin River Task Force (SJRTF). The USJR region faces many water resources management challenges now and in the future. The objective of the IRWMP is to identify implementable actions and projects that enhance water quality and water supply for beneficial uses in the USJR.

The USJR planning area is centrally located in the San Joaquin Valley and covers the river channel, levees, and floodplain from the Friant Dam to the confluence with the Merced River, including major areas of Merced, Madera, and Fresno Counties.

There is a great need for development of a coordinated regional effort to address water management issues in the USJR region. Improving water supply reliability and water quality for agricultural and ecological purposes should be coordinated regionally to enhance working relationships between participants. Restoration and water management planning need to be integrated to consider individual stakeholder issues, as well as cumulative impacts and benefits of proposed projects.

Our comments on the preliminary proposal evaluation are attached for your review. There are a number of areas where we feel greater credit should have been given based on the content of the proposal.

Chris White

General Manager  
Central California Irrigation District

**Proposition 50 Preliminary Evaluation Comments – PIN 4816**  
**San Joaquin River Exchange Contractors Water Authority**

**Work Plan** – The evaluation states “The final product does not show an adopted IRWMP but only a report. Therefore it appears that additional work would be required after this proposal to complete the IRWMP, which was identified as the purpose of the proposal.”

It is not the intent of the proposal to simply adopt a report. The intent is that the RMC and SJRTF adopt the IRWMP and provide the institutional structure for implementation. There would be no additional work required after this proposal to complete the IRWMP. The proposal states in a number of places that the IRWMP plan, not just the report, will be adopted at the end of the planning process.

- 1) The fourth paragraph on page 4 of Section 2 Subsection 2.1 states “The RMC and SJRTF will jointly guide the development and adoption of the Conceptual Plan/IRWMP. The plan will be adopted upon completion by a vote of the RMC Board of Directors.”
- 2) The second paragraph on page 21 of Section 3 Subsection 3.6 – Task 6 Develop Implementation Phasing states “The RMC and SJRTF, in coordination with other federal, state, and local agencies, will provide the institutional structure for plan implementation.”
- 3) Under Section 3 Subsection 3.9 - Task 9 Prepare Final Report states “Resolutions adopting the document will be included in an appendix to the final report.” By definition, adopting the report that describes the implementation plan is assumed to be equivalent to the adoption of the IRWMP, not just the document.
- 4) It was an oversight in the preparation of the proposal that the project schedule, in Figure 5-1, does not show a marker noting the adoption of the IRWMP.

**Implementation** - The evaluation states “It is not clear what the schedule will be for other projects, such as restoration projects, and if this process will be used to monitor the projects or the IRWMP”.

The schedule described in Section 3 subsection 3.6 Task 6 Develop Implementation Phasing will describe the implementation timing for all the actions/projects that are included in the IRWMP. Dependency on development of new water supplies is only linked to specific restoration actions that may require additional water for implementation.

The language in this section states the following “The RMC and SJRTF, in coordination with other federal, state, and local agencies, will provide the institutional structure for plan implementation. A master schedule will be developed to show the status of each element of the proposed plan and the phased nature by which specific plan actions and alternatives will be implemented. This schedule for implementation of specific restoration actions will correspond to the phased development of potential “new” water supplies available under the plan.”

**Stakeholder Involvement** – The evaluation notes that some stakeholders appear to be missing such as environmental groups and the San Joaquin Parkway and Conservation Trust.

It is recognized that these groups have not been partners in the initial planning that has been conducted to date, but a major thrust of the proposal and a significant portion of the budget is designed to engage these groups in the IRWMP process as noted below.

- 1) Section 2 Subsection 2.9 Stakeholder Involvement - Describes the formation of a Stakeholder Advisory Committee and public outreach program designed to solicit input and gain participation from the local community and other stakeholders. The purpose of two public workshops, as stated on page 14, is to “Identify other potential agencies and participants and engage them in the development of the Conceptual Plan/IRWMP”.
- 2) Section 2 Subsection 2.11 Relationship to Local Planning - Notes the need for consultation with entities such as the San Joaquin River Conservancy
- 3) The first two tasks in the work plan are targeted at this issue. Section 3 Subsection 3.1 Task 1 Stakeholder Advisory Committee states “The RMC and SJRTF will continue to solicit broader participation of entities responsible for land use planning and water management in the USJR region”
- 4) Section 3 Subsection 3.2 Task 2 Public Outreach states “The RMC will hold two public workshops to solicit input from the community regarding the preparation of the Conceptual Plan/IRWMP and to identify other agencies and stakeholders that may wish to participate”.

**Relation to Local Planning** – The evaluation states “The proposal only marginally addresses other local planning documents and does not relate water management strategies to local planning documents. General plans for cities were not discussed and it is not clear if these documents will be used to develop the IRWMP”.

- 1) Section 2 Subsection 2.1 paragraph 3 of the proposal notes that the SJRTF includes two representatives each from the Board of Supervisors of Fresno, Madera, and Merced Counties. The SJRTF was created to help coordinate planning and review of issues in the USJR region, including flood control, water quality, ecosystem enhancement, water supply, and groundwater management.
- 2) Section 2 Subsection 2.1 paragraph four, states “The RMC and SJRTF will support implementation of the Conceptual Plan/IRWMP in partnership with other implementing federal, state, and local agencies to the extent possible through local and regional programs.”
- 3) Section 3 Subsection 3.3 Task 3 Review Regional Water Management – States that “Local county, city, and regional agency general plans and planning documents will be reviewed in coordination with agency staff to identify opportunities and

constraints that may affect the development of alternative restoration and water management strategies".